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8 Attorneys for Plaintiff and Counterdefendant
 NEXTDOOR.COM, INC.

9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 NEXTDOOR.COM, INC., a Delaware
 14 corporation,

15 Plaintiff,

16 v.

17 RAJ ABHYANKER, an individual,

18 Defendant.

19 RAJ ABHYANKER, an individual,

20 Counterclaimant,

21 v.

22 NEXTDOOR.COM, INC., a Delaware
 corporation; PRAKASH JANAKIRAMAN, an
 23 individual; BENCHMARK CAPITAL
 PARTNERS, L.P., a Delaware limited
 24 partnership; BENCHMARK CAPITAL
 MANAGEMENT CO. LLC, a Delaware limited
 25 liability company; SANDEEP SOOD, an
 individual; MONSOON ENTERPRISES, INC., a
 26 California corporation, and DOES 1-50,
 inclusive,

27 Counterdefendants.
 28

Case No.: 3:12-cv-05667-EMC

**STIPULATION FOR DEFENDANT
 AND COUNTERCLAIMANT RAJ
 ABHYANKER'S PRODUCTION OF
 DOCUMENTS**

1 Plaintiff and Counterdefendant Nextdoor.com, Inc. ("Plaintiff") and Defendant and
 2 Counterclaimant Raj Abhyanker ("Defendant"), by and through their respective counsel of
 3 record, hereby stipulate that Defendant and Counterclaimant Raj Abhyanker shall:

- 4 - produce on or by May 30, 2014 a substantial production of documents responsive to
 5 Plaintiff's discovery requests from Mr. Abhyanker's @fatdoor.com email address, as
 6 well as the non-email documents in Mr. Abhyanker's possession, custody and control,
 7 which are both responsive to document requests served by Nextdoor.com and not
 8 contained in the Toshiba hard drive of which each party received a mirror copy earlier
 9 this month (the "Hard Drive"). Such production will be made via hand delivery before
 10 6pm to Fenwick & West's Mountain View offices;
- 11 - agree that in those instances where Mr. Abhyanker's response to Nextdoor.com's
 12 written discovery requests reads "To the extent that he locates other responsive
 13 documents not previously produced or available to the plaintiffs/Counterclaim
 14 Defendants, such documents will be produced," Mr. Abhyanker will be producing all
 15 unprivileged, responsive documents in the possession custody or control of Mr.
 16 Abhyanker, and that he is not withholding documents on relevancy grounds;
- 17 - not withhold from production on the basis of privilege or work product, any
 18 correspondence or other responsive documents made to or with third parties (including
 19 witnesses) when such correspondence or other responsive documents do not qualify as
 20 privileged under the attorney-client privilege or work product doctrine. By way of
 21 example, the parties stipulate that emails to third parties, including witnesses, will not
 22 be withheld under the attorney-client privilege or as work product, even if attorneys
 23 are also copied on such correspondence.

24 Dated: May 28, 2014

FENWICK & WEST LLP

26 By: /s/Laurence F. Pulgram
 27 Laurence F. Pulgram

28 Attorneys for Plaintiff and Counterdefendant
 NEXTDOOR.COM, INC.

1 Dated: May 28, 2014

LEGALFORCE RAJ ABHYANKER, P.C.

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3 By: /s/ Brian Orion
Brian Orion

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5 Attorneys for Defendant and Counterclaimant
RAJ ABHYANKER

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7 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

8 I, Laurence F. Pulgram, attest that concurrence in the filing of this document has been
9 obtained from any signatories indicated by a “conformed” signature (/s/) within this e-filed
10 document. I declare under penalty of perjury under the laws of the United States of America that
11 the foregoing is true and correct.

12 Dated: May 28, 2014

By: /s/Laurence F. Pulgram
Laurence F. Pulgram

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14 Attorneys for Plaintiff and Counterdefendant
NEXTDOOR.COM, INC.

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO